

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

---

Nationwide Judgment Recovery Inc.,

Case: 1:20-mc-00381-KPF

Plaintiff,

-against-

Luigj Berishaj,

Defendant.

---


**MEMO ENDORSED**

**DEFENDANT'S MOTION FOR REHEARING**

Defendant, LUIGJ BERISHAJ, hereby files *pro se* and states as follows:

1. Defendant was not adequately represented during show cause hearing on August 20, 2021, at 11:00am.
2. Defendant has not waived his right to representation by counsel.
3. The exemption notice provided by Chase Bank as required by the state law of New York includes earned income in the last 60 days (90% of which may be exempt). Such exemption of bank account assets was not asserted in Defendant's position at said hearing.
4. In *Defendant's Response to Plaintiff's Objection to Defendant's Claim of an Exemption*, Defendant provided proof of income derived from wages within the last 60 days dating from March 22, 2021 through May 22, 2021, in the total amount of \$39,118.02.
5. Defendant requests a motion for rehearing in this matter to have these issues relitigated by counsel.

Dated: August 27, 2021



---

Luigj Berishaj, Defendant

Application GRANTED. The parties are hereby ORDERED to appear for a telephonic conference on **October 22, 2021, at 2:30 p.m.** At the specified time, the parties shall call (888) 363-4749 and enter access code 5123533. Please note, the conference line will not be available prior to 2:30 p.m.

The Clerk of Court is directed to mail a copy of this endorsement to Defendant's address of record.

Dated: August 27, 2021  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE